

Exhibit B

Detweiler Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**DECLARATION OF DONALD J. DETWEILER IN SUPPORT OF THE APPLICATION
OF THE DEBTORS FOR AN ORDER UNDER 11 U.S.C. §§ 327(A) AND 328(A), FED. R.
BANKR. P. 2014 AND 2016, AND DEL. BANKR. L.R. 2014-1 AND 2016-1
AUTHORIZING AND APPROVING THE EMPLOYMENT AND RETENTION
OF WOMBLE BOND DICKINSON (US) LLP AS CO-COUNSEL
NUNC PRO TUNC TO OCTOBER 6, 2023**

Donald J. Detweiler, pursuant to 28 U.S.C. § 1746, certifies as follows:

1. I am a partner of the law firm of Womble Bond Dickinson (US) LLP (“**WBD**”) which maintains an office for the practice of law at 1313 North Market Street, Suite 1200, Wilmington, Delaware 19801, as well as offices in California, the District of Columbia, Georgia, Maryland, Massachusetts, New York, North Carolina, South Carolina, Texas, and Virginia. I will assume primary responsibility within WBD for its engagement in the Chapter 11 Cases.

2. Except as otherwise indicated, all facts set forth in this declaration (the “**Declaration**”) are based upon my personal knowledge, information supplied to me by other WBD professionals or paraprofessionals, or learned from my review of relevant documents. To the extent any information disclosed herein requires amendment or modification as additional party in interest information becomes available to WBD, a supplemental declaration will be submitted to this Court reflecting such amended or modified information.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

3. I submit this Declaration to provide support and disclosures in connection with the Application² to retain WBD as bankruptcy counsel for the above-captioned debtors and debtors-in-possession (the “**Debtors**”), *nunc pro tunc* to October 6, 2023, as required by Bankruptcy Code sections 327(a) and 328(a), Bankruptcy Rules 2014(a) and 2016(b), and Local Rules 2014-1 and 2016-1.

QUALIFICATION OF PROFESSIONALS

4. On or about October 6, 2023, WBD was retained by the Debtors to act as bankruptcy co-counsel. The Debtors selected WBD as their bankruptcy co-counsel based upon, among other things, WBD’s recognized expertise in the field of business reorganizations and restructurings. WBD possesses extensive experience and knowledge practicing before bankruptcy courts in large and complex chapter 11 cases.

5. I am the principal WBD attorney working on this engagement. I have extensive experience in corporate restructurings and related matters. I have also represented secured lenders, providers of debtor-in-possession financing, trustees, unsecured creditors, and potential purchasers of assets in both in-court and out-of-court restructurings. Other professionals and paraprofessionals in WBD’s insolvency practice and in other practice areas, many of whom also have extensive experience in corporate restructurings generally, and debtor representations in chapter 11 cases specifically, will participate in the representation of the Debtors in the Chapter 11 Cases.

6. Due to WBD’s experience and knowledge in the field of debtors’ and creditors’ rights and business reorganizations under chapter 11 of the Bankruptcy Code, I believe that WBD is well-qualified to act on the Debtors’ behalf. Accordingly, subject to this Court’s

² Capitalized terms not defined herein shall have the meanings ascribed to them in the Application.

approval of the Application, WBD has agreed to perform the services requested by the Debtors as set forth herein.

SERVICES TO BE PROVIDED

7. In connection with the Chapter 11 Cases, the Debtors have requested court authorization to retain WBD as attorneys for the Debtors. The Debtors require WBD to render legal services relating to the day-to-day administration of the Chapter 11 Cases and the myriad issues that may arise in this case, including, among other things:

- a. advising the Debtors with respect to their powers and duties as debtors-in-possession in the continued management and operation of their businesses and properties;
- b. attending meetings and negotiating with representatives of creditors, interest holders, and other parties in interest;
- c. analyzing proofs of claim filed against the Debtors and potential objections to such claims;
- d. taking necessary action on behalf of the Debtors to negotiate, obtain approval of and consummate the sale(s) of the Debtors' assets;
- e. analyzing executory contracts and unexpired leases and potential assumptions, assignments, or rejections of such contracts and leases;
- f. taking all necessary action to protect and preserve the Debtors' estates, including prosecuting actions on the Debtors' behalf, defending any action commenced against the Debtors, and representing the Debtors' interests in negotiations concerning litigation in which the Debtors are involved, including objections to claims filed against the estates;
- g. prosecuting any cash collateral or financing before the Court on behalf of the Debtors;
- h. preparing motions, applications, answers, orders, reports, and papers necessary to the administration of the Debtors' estates;

- i. taking necessary action on behalf of the Debtors to negotiate, prepare, and obtain approval of a disclosure statement and confirmation of a plan of reorganization;
- j. advising the Debtors in connection with any potential sale of assets or stock and taking necessary action to guide the Debtors through such potential sale;
- k. appearing before this Court or any Appellate Courts and protecting the interests of the Debtors' estates before those Courts and the United States Trustee for the Northern District of Ohio;
- l. advising on corporate, litigation, environmental, finance, tax, employee benefits, and other legal matters; and
- m. performing all other necessary legal services for the Debtors in connection with these Chapter 11 Cases.

8. WBD intends to use its best efforts to avoid any unnecessary duplication of services provided by any of the Debtors' retained professionals in the Chapter 11 Cases, including, but not limited to, Debtors' co-counsel, White & Case ("W&C").

DISINTERESTEDNESS

9. WBD and certain of its partners, counsel, and associates may have in the past represented, may currently represent, and likely in the future will represent parties in interest of the Debtors. All such representations have been in matters unrelated to the Debtors and the Chapter 11 Cases. WBD has searched its electronic database for its connections to the entities listed on Schedule 1 hereto (collectively, the "**Potential Parties in Interest**"). The information listed on Schedule 1 may change during the pendency of the Chapter 11 Cases. WBD will update this Declaration, as described below, when WBD becomes aware of new material information.

10. The chart set forth on Schedule 1 hereto summarizes the results of the forgoing representations by WBD of the Potential Parties in Interest, all of which were with respect to matters unrelated to the Debtors and the Chapter 11 Cases. To my knowledge, upon reasonable

inquiry and as described in greater detail on Schedule 1, and subject to any explanations and exceptions set forth thereon, WBD does not hold or represent any interest adverse to the Debtors or the Debtors' estates. I do not believe that WBD's current and prior representations described in Schedule 2 preclude WBD from being a disinterested party under the Bankruptcy Code.

11. WBD will periodically review its files during the pendency of the Chapter 11 Cases to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new relevant facts or relationships are discovered or arise, WBD will use reasonable efforts to identify such further developments and will promptly file a supplemental declaration, as required by Bankruptcy Rule 2014(a).

12. Based upon the information available to me, neither I, nor WBD, nor any partner or associate thereof, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates. Based on the foregoing and to the best of my knowledge, I believe that: (a) WBD is a "disinterested person" within the meaning of Bankruptcy Code section 101(14), as required by Bankruptcy Code section 327(a), and does not hold or represent an interest adverse to the Debtors' estates; and (b) WBD has no connection to the Debtors, their creditors, or their related parties except as may be disclosed in this Declaration (as supplemented from time-to-time). The proposed engagement of WBD is not prohibited by or improper under Bankruptcy Rule 5002(a).

PROFESSIONAL COMPENSATION

13. WBD intends to apply to the Court for allowance of compensation for professional services and reimbursement of expenses incurred in connection with the Chapter 11 Cases in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable procedures and orders of the Court. Such

applications will constitute a request for interim payment of WBD's reasonable fees and expenses to be determined at the conclusion of the Chapter 11 Cases.

14. WBD's hourly rates are set at a level designed to compensate WBD fairly for the work of its attorneys and paraprofessionals and to cover fixed and routine overhead expenses. Hourly rates vary with the experience and seniority of each professional and are subject to periodic adjustments, generally on or about October 1 of each year, to reflect economic and other conditions, with the hourly rate charged being the hourly rate in effect on the date that the services were performed. The hourly rates for such professionals are based upon the experience and expertise of the attorney or legal assistant involved and are subject to periodic adjustments to reflect economic and other conditions. WBD will provide notice of any rate increases to the Debtors, the U.S. Trustee, and any official committees and will file such notice with the Court. Set forth below is a schedule of hourly rates of certain professionals at WBD:

Partners	\$325 - \$1,460
Of Counsel	\$430 - \$930
Associates	\$325 - \$705
Senior Counsel	\$125 - \$895
Counsel	\$125 - \$835
Paralegals	\$105 - \$565

15. Subject to Court approval, WBD expects that the following attorneys will be primarily responsible for representing the Debtors in this matter: Donald J. Detweiler and Morgan L. Patterson. The attorneys' hourly rates are \$845 and \$720, respectively.

16. Consistent with WBD's policy with respect to its other clients, WBD will continue to charge the Debtors for all services provided and for other charges and disbursements incurred in the rendition of services. It is WBD's policy to charge its clients in all areas of practice for identifiable, non-overhead expenses incurred in connection with the client's case that

would not have been incurred except for representation of that particular client. It is also WBD's policy to charge its clients only the amount actually incurred by WBD in connection with such items. These charges and disbursements include (without limitation) costs for third-party photocopying, electronic data management services, including scanning and document imaging, travel, travel-related expenses, business meals, messengers, couriers, postage, witness fees, and other fees related to trials and hearings. WBD professionals also may charge their overtime meals and overtime transportation to the Debtors consistent with its ordinary practices.

17. No promises have been received by WBD, or any partner, counsel, or associate thereof, as to payment or compensation in connection with the Chapter 11 Cases other than in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the U.S. Trustee Guidelines. WBD has not entered into any agreements, express or implied, with any other party in interest, including the Debtors, any creditor, or any attorney for such party in interest in the Chapter 11 Cases for (a) the purpose of sharing or fixing fees or other compensation to be paid to any such party in interest or its attorneys for services rendered in connection therewith, (b) payment of such compensation from the assets of the estates in excess of the compensation allowed by this Court pursuant to the applicable provisions of the Bankruptcy Code, or (c) payment of compensation in connection with the Chapter 11 Cases other than in accordance with the applicable provisions of the Bankruptcy Code.

I hereby declare under the penalty of perjury that the foregoing statements made by me are true and correct to the best of my knowledge, information, and belief.

Dated: October 31, 2023

/s/ Donald J. Detweiler
Donald J. Detweiler (DE Bar No. 3087)

Schedule 1

Debtor Entities

1. Lordstown Motors Corp. (DE)
2. Lordstown EV Corp. (DE)
3. Lordstown EV Sales LLC (DE)

Related/Former Names of Entities

1. DiamondPeak Holdings Corp. (n/k/a Lordstown Motors Corp.)
2. DPL Merger Sub Corp. (n/k/a Lordstown EV Corporation)
3. MIH EV Design, LLC

Directors and Officers

1. Adam Kroll
2. Angela Strand
3. Dale Spencer
4. Daniel Ninivaggi
5. David T. Hamamoto
6. Donna Bell
7. Edward T. Hightower
8. Jane Reiss
9. Joseph B. Anderson Jr.
10. Keith Feldman
11. Laura Soave
12. Melissa Leonard

Former Directors and Officers

1. Jane Ritson-Parsons
2. John LeFleur
3. John R. Whitcomb
4. Michael Gates
5. Mickey Kowitz
6. Martin Rucidlo
7. Rebecca Roof
8. Stephen S. Burns
9. Thomas V. Canepa

Senior Employees

1. Cheryl Johnson
2. Darren Post
3. Jill Coniglio-Kirk
4. Carter Driscoll
5. Michael Port
6. Raghu Aerabati
7. Waqar Hashim
8. Andrew Reyntjes

Top Unsecured Creditors

1. Amphenol Interconnect Products Corporation
2. AP Expert Group LLC
3. AT&T MOBILITY-CC
4. Barry L. Leonard and Company Inc. dba Trans Machine Technologies
5. Bossard Inc.
6. CEVA Contract Logistics US Inc
7. Cognizant Mobility, Inc
8. Elaphe Propulsion Technologies LTD
9. Fiberdyne Research Pty Ltd
10. Filec Production SAS - Amphenol
11. Foxconn EV System LLC
12. Greatech Intergration (M) SDN.BHD.
13. Harco Manufacturing Group, LLC
14. HRB Industries Corp.
15. JVIS USA LLC
16. Laval Tool & Mould LTD.
17. Marelli North America Inc dba CalsonicKansel North America Inc
18. Meta Systems SpA
19. Nexteer Automotive Corporation
20. Pektron EV Limited
21. Proper Group Holdings LLC dba Proper Tooling LLC
22. Quality MetalCraft Inc.
23. SA Automotive LTD
24. Sharp Dimension Inc
25. St. Clair Technologies Inc.
26. Superior Cam Inc
27. Technology Solutions Anywhere LLC dba Readysoft
28. Teijin Automotive Technologies, Inc

29. The Timken Corporation
30. Three-Dimensional Services dba 3 Dimensional Services Group
31. thyssenkrupp Materials NA, Inc. dba Ken-Mac Metals or thyssenkrupp Steel Services
32. Ventra Group Co. dba Flex-N-Gate Bradford
33. VIA Optronics LLC
34. Zetwerk Manufacturing USA, Inc.
35. ZF Passive Safety Systems US Inc.
36. CSB Strategic Business Solutions

Cash Management Banks

1. JP Morgan Asset Management
2. JP Morgan Chase Bank, N.A.
3. JP Morgan Institutional Investments Global Liquidity
4. JP Morgan Prime
5. JP Morgan Securities

Significant Lease and Contract Counterparties

1. 275 Hills Tech Ventures LLC
2. Aon (Bermuda) Ltd.
3. Aon Risk Services Central Inc.
4. Aon UK Limited
5. Arthur J. Gallagher Risk Management Services, Inc.
6. Applied Medical Resources Corporation
7. Cigna Health and Life Insurance Company
8. Elaphe Propulsion Technologies Ltd.
9. Foxconn EV Property Development LLC
10. Foxconn EV System LLC
11. GAC R&D Center Detroit, LLC
12. General Motors
13. GM EV Holdings LLC
14. Liberty Property and Asset Management
15. Michigan Strategic Fund
16. Paylocity Corporation
17. Principal Life Insurance Company
18. TenantBase, Inc.

19. TransAmerica Corporation
20. Willowgreen Building Group, LLC
21. Workhorse Group Inc.

Significant Vendors

1. A Say Inc dba Say Communications LLC
2. A.K.Stamping Company, Inc
3. ABSOLUTE ELECTRONICS INC
4. Akebono Brake Company
5. Amphenol Interconnect Products Corporation
6. Anchor Tool and Die Company dba Anchor Manufacturing Group, Inc.
7. Anderton Castings SAS
8. AP Expert Group LLC
9. Armada Toolworks LTD.
10. AT&T MOBILITY-CC
11. ATCO Industries, Inc.
12. Auto Motive Power Inc
13. Baker Hostetler
14. Barry L. Leonard and Company Inc. dba Trans Machine Technologies
15. Bennie W Fowler, LLC
16. Bossard Inc.
17. Brikho & Kallabat, P.C. DBA Joseph Kallabat and Associates, PC
18. CEVA Contract Logistics US Inc
19. CEVA International, Inc
20. CITIC Dicastal Co., Ltd.
21. Cognizant Mobility, Inc
22. Cognizant Worldwide Limited
23. Complete Discovery Source, Inc (CDS)
24. Contour Hardening Inc.
25. Cox Automotive Mobility Solutions, Inc
26. Cox Automotive, Inc - Manheim
27. Custodial Building Services, Inc
28. DAG LTD, LLC
29. Detroit Engineered Products dba DEP
30. Duggan Manufacturing LLC
31. Elaphe Propulsion Technologies LTD
32. Fiberdyne Research Pty Ltd
33. Filec Production SAS - Amphenol
34. Foshan Aoya Electrical and Mechanical Co., Ltd.

35. Foxconn EV Property Development LLC
36. Foxconn EV System LLC
37. Greatech Intergration (M) SDN.BHD.
38. Harco Manufacturing Group, LLC
39. Haynes and Boone, LLP
40. HRB Industries Corp
41. HubSpot Inc
42. IEE S.A.
43. Infosys Limited
44. Jiangyin Haida Rubber and Plastic Co., Ltd. dba Haida
45. JVIS USA LLC
46. KPMG LLP
47. Lasky, LLC
48. Laval Tool & Mould LTD.
49. Logicalis, Inc.
50. Lumma Clean LLC
51. Mahle Behr USA Inc
52. Mainfreight, Inc - Canada
53. Mainfreight, Inc.
54. Marelli North America Inc dba CalsonicKansel North America Inc
55. Megatronix (Beijing) Technology Co., Ltd.
56. Meta Systems SpA
57. Miotti Srl
58. Mosaic Corporation
59. MSSC US INC.
60. New Eagle, LLC
61. Nexteer Automotive Corporation
62. OpenText Inc.
63. Payscale Inc
64. Pektron EV Limited
65. Pi Innovo LLC
66. Pierburg US LLC
67. Potter Anderson & Corron LLP
68. Principal Life Insurance Company
69. Proper Group Holdings LLC dba Proper Tooling LLC
70. Quality MetalCraft Inc.
71. Racar Engineering, LLC
72. Ready Logistics, LLC
73. Roush Industries, Inc.
74. RTL Systems, LLC
75. SA Automotive LTD
76. Schwab Industries, Inc.
77. SG Automotive d.o.o.
78. Sharp Dimension Inc
79. Sherpa Commercial Vehicles, LLC
80. Silverman Consulting, Inc
81. Simpson Thacher & Bartlett LLP
82. Socotec Advisory, LLC
83. St. Clair Technologies Inc.
84. Sullivan & Cromwell LLP
85. Superior Cam Inc
86. Sybridge Technologies Canada, Inc
87. Technology Solutions Anywhere LLC dba Readysoft
88. Teijin Automotive Technologies, Inc
89. TERIS - Phoenix LLC DBA TERIS
90. The Timken Corporation
91. Three-Dimensional Services dba 3 Dimensional Services Group
92. Thyssenkrupp Materials NA, Inc. dba Ken-Mac Metals or thyssenkrupp Steel Services
93. Transportation Research Center, Inc. dba TRC, Inc.
94. Triple Crown Consulting, LLC
95. TTI, INC dba Symmetry Electronics (a division of TTI, Inc.) and RFMW(a division of TTI, Inc.)
96. Ventra Group Co. dba Flex-N-Gate Bradford
97. VIA Optronics LLC
98. Victora Auto Private Limited
99. Zetwerk Manufacturing USA, Inc
100. ZF PASSIVE SAFETY SYSTEMS US INC.
101. Amazon Web Services
102. Amerit Fleet Solutions, Inc.
103. Cintas Corp.
104. Cintas Corporation No. 2
105. devPHASE LLC
106. E*TRADE Financial Corporate Services, Inc. c/o Corp Tax Dep Arlington
107. Fiberdyne
108. GE Digital LLC
109. Intrado Digital Media, LLC
110. Kevin J. Soltis dba Quality Sorting

111. Luis Mayen dba Guarantee Details Cleaning
112. Luxit
113. Marks Reliable Towing LLC dba MRT
114. ODP Business Solutions, LLC
115. Paragon Die & Engineering Company
116. Red Dawn Intermediate I, Inc.
117. Rentokil North America, Inc dba Western Exterminator Company
118. Ricoh USA, Inc.
119. Robar Public Relations
120. Robert Half International Inc.
121. Samsung SDI America, Inc.
122. Syngin Technology, LLC – Wallenius Wilhelmssen
123. Tata Consulting Services Limited
124. Technical Molding Management System, Inc
125. Teoresi, Inc.
126. Vestige Ltd dba Vestige Digital Investments

Customers

1. Army Contracting Command - Detroit Arsenal (ACC-DTA)
2. City of Washington, D.C.
3. Greenstreet EV Inc.
4. JoeyB QB LLC
5. Pratt & Miller Engineering & Fabrication LLC
6. San Diego Unified Port District
7. Sherpa Commercial Vehicles LLC

Investors with over 5% Holdings

1. Foxconn (Far East) Limited
2. Foxconn EV Technology, Inc.
3. Foxconn Ventures Pte. Ltd.
4. Foxteq Holdings Inc.
5. Foxteq Integration Inc.
6. Hon Hai Precision Industry Co., Ltd.
7. Hon Hai Technology Group
8. PCE Paragon Solutions Kft.

Debtor Restructuring Professionals

1. Jefferies Group LLC
2. Kurtzman Carson Consultants, LLC
3. Richards Layton & Finger, P.A.
4. Silverman Consulting, Inc.
5. White & Case LLP

Ordinary Course Professionals & Professionals of Parties in Interest

1. Akin Gump Strauss Hauer & Feld LLP
2. Ankura Intermediate Holdings, LP dba Ankura Consulting Group LLC
3. Baker & Hostetler LLP
4. Bernstein Litowitz Berger & Grossman, LLP
5. Bodman PLC
6. Climaco, Wilcox, Peca, Tarantino & Garofoli
7. Cohen Rosenthal & Kramer
8. Cooch and Taylor
9. Cummins Law
10. deLeeuw Law LLC
11. Dechert LLP
12. Deloitte & Touche LLP
13. Dentons US
14. Dittmer, Wagoner & Steele
15. Elfvin, Klingshirn, Royer & Torch, LLC
16. Employment Law Partners
17. Entwistle & Cappucci LLP
18. Ernst & Young U.S. LLP
19. Fisher and Phillips LLP
20. Foley & Lardner LLP
21. FTI Consulting, Inc.
22. Gladstein, Neandross & Associates
23. Hagens Berman Sobol Shapiro LLP
24. Haynes and Boone, LLP
25. Kaskela Law LLC
26. Kooperman Mentel Ferguson Yaross
27. KPMG LLP
28. Labaton Sucharow LLP
29. Latham & Watkins LLP
30. Law Office of Daniel R. Karon
31. Lasky, LLC
32. Lifshitz Law PLLC
33. Long Law, LLC

34. Mercer Capital Management, Inc.
35. Merriman Legando Williams & Klang
36. Murray, Murphy, Moul & Basil
37. Nelson Mullins Riley & Scarborough
LLP
38. Paul Hastings LLP
39. Perantinides & Nolan
40. Perez & Morris
41. Phillips ADR Enterprises PC
42. Pomerantz LLP
43. Potter Anderson & Corroon LLP
44. Prospect Law LLP
45. Purcell & Lefkowitz LLP
46. Robbins Geller Rudman & Dowd
47. RSM US LLP
48. Saxena White
49. Schall Law
50. Schubert Jonckheer & Kolbe LLP
51. Seyfarth Shaw LLP
52. Shapiro Haber & Urmy LLP
53. Simpson Thacher & Bartlett LLP
54. Socotec Advisory, LLC
55. Strauss Troy
56. Sullivan & Cromwell LLP
57. The Brown Law Firm, P.C.
58. The Rosen Law Firm, P.A.
59. Winston & Strawn LLP
60. WIT Legal, LLC
61. Zoll & Kranz
62. Allen & Overy LLP
63. Brown Rudnick LLP
64. Chipman Brown Cicero & Cole, LLP
65. Connolly Gallagher LLP
66. Cross & Simon, LLC
67. Lowenstein Sandler LLP
68. M3 Partners
69. Miller, Canfield, Paddock and Stone,
P.L.C.
70. Morris James LLP
71. Pashman Stein Walder Hayden, P.C.
72. Polsinelli PC
73. Snell & Wilmer L.L.P.
74. Sullivan Hazeltine Allinson LLC
75. Troutman Pepper Hamilton Sanders LLP
76. Warner Norcross + Judd LLP
77. Young Conaway Stargatt & Taylor, LLP

Insurance Parties

1. Accredited Specialty Insurance
Company
2. Allied World Specialty Insurance
Company
3. Associated Industries Insurance Co., Inc
4. AXIS Insurance Company
5. Berkley Insurance Company
6. CFC Underwriting / Lloyds
7. Continental Casualty Company
8. Endurance Assurance Corporation
9. Fair American Insurance & Reinsurance
Co
10. Gemini Insurance Company
11. General Star Indemnity Company
12. Hudson Insurance Company
13. Ironshore Specialty Insurance Company
14. Magna Carta Insurance Ltd. / Lloyds
15. National Union Fire Ins Co of
Pittsburgh, PA
16. RSUI Indemnity Company
17. RT Specialty Insurance Services, LLC
18. Samsung Fire & Marine Ins Co Ltd (US
Br)
19. SiriusPoint Bermuda Insurance
Company
20. The Cincinnati Indemnity Company
21. The Cincinnati Insurance Company
22. Underwriters At Lloyds London
23. Westfield Specialty Insurance Comp
24. XL Specialty Insurance Company

Utilities

1. AT&T Business Direct
2. AT&T MOBILITY-CC
3. Comcast Holdings Corporation dba
Comcast Cable Communication
Management LLC
4. Cox Communications California LLC
dba Cox Business
5. CR&R Environmental Services
6. Detroit Disposal & Recycling
7. Irvine Ranch Water District

8. Sonitrol Orange County
9. Southern California Edison
10. Southern California Gas Company dba
The Gas Company; So Cal Gas

Taxing and Regulatory Authorities

1. California Franchise Tax Board
2. California Department of Tax and Fee Administration
3. California State Board of Equalization
4. Committee on Foreign Investment in the United States
5. Delaware Secretary of State
6. Delaware State Treasury
7. Delaware Tax Authority
8. Internal Revenue Service
9. Michigan Department of Treasury
10. National Highway Traffic Safety Administration
11. Ohio Bureau of Workers' Compensation
12. Ohio Department of Taxation
13. Orange County Property Taxes
14. Pipeline and Hazardous Materials Safety Administration
15. Securities and Exchange Commission
16. U.S. Department of Justice
17. U.S. Patent and Trademark Office
18. Village of Lordstown, OH Income Tax Department

Litigation Parties

1. Alicia Kelley
2. An Thai
3. Andrew C. Richardson
4. Angela Strand Boydston
5. Ashith Pabbathi
6. Atri Amin
7. Bei Qin
8. Benjamin Herbert
9. Caimin Flannery
10. Carole Cooper
11. Christopher Kim
12. Chuan D. Vo
13. Claude L. Patterson

14. Dale G. Spencer
15. Dan Zhihong Huang
16. Daniel J. Cohen
17. Daniel Tavares
18. Dari Tehrani
19. Darren Post
20. David M. Cohen
21. David T. Hamamoto
22. Ed Lomont
23. Eskander Tehrani
24. Ethan Fingerer
25. Evaristo Sarabia
26. FNY Managed Accounts LLC
27. George Troicky
28. Globestar Systems Inc.
29. Gurpreet Singh
30. Herbert Stotler
31. Hong Xin Huan (a/k/a George Huan)
32. Jane Reiss
33. Janelle Jackson
34. Jesse Brury
35. John H. Jenkins
36. John LeFleur
37. John Vo
38. Joshua Betof
39. Judith A. Hannaway
40. Julio C. Rodriguez
41. Karma Automotive LLC
42. Keith A. Feldman
43. Kenneth Davenport
44. Kevin Levent
45. Kin San Chan
46. M.R.S. Leasing Corporation LTD
47. Mario Guerrero
48. Mark A. Walsh
49. Martin J. Rucidlo
50. Matthew Rico
51. Michael Fabian
52. Michael D. Gates
53. Mickey W. Kowitz
54. Mohammed Chowdhury
55. Phil Richard Schmidt
56. Pnina Cohen
57. Punak Engineering, Inc.
58. Randy Slipher
59. Raymond Romano

60. Robert Miller
61. Robert Palumbo
62. Roger J. Durre
63. Shane Brown
64. Simha Cohen
65. Stephen Punak
66. Stephen S. Burns
67. Steven R. Hash
68. Steven Terry
69. Sulayman Zuod
70. DiamondPeak Sponsor LLC
71. Silverpeak and related entities (which includes SP SPAC Sponsor LLC, Silverpeak Real Estate Partners L.P., Silverpeak Strategic Partners LLC, Silverpeak Credit Partners LP, Silverpeak Renewables Investment Partners LP, and certain other affiliated entities)

Lien Holders

1. Competition Engineering, Inc.
2. Foxconn EV Technology, Inc.
3. Hewlett-Packard Financial Services Company
4. Peterson Jig and Fixture, Inc.
5. Precision Jig and Fixture
6. Proper Tooling, LLC & Proper Group International, LLC

Office of the United States Trustee (Wilmington, DE)

1. Andrew Vara
2. Benjamin Hackman
3. Christine Green
4. Denis Cooke
5. Diane Giordano
6. Dion Wynn
7. Edith A. Serrano
8. Hannah M. McCollum
9. Holly Dice
10. James R. O'Malley
11. Jane Leamy
12. Joseph Cudia
13. Joseph McMahon

14. Juliet Sarkessian
15. Karen Starr
16. Lauren Attix
17. Linda Casey
18. Linda Richenderfer
19. Michael Panacio
20. Nyanquoi Jones
21. Richard Schepacarter
22. Rosa Sierra-Fox
23. Shakima L. Dortch
24. Timothy J. Fox, Jr.

United States Bankruptcy Judges in the District of Delaware

1. Ashley M. Chan
2. Brendan L. Shannon
3. Craig T. Goldblatt
4. John T. Dorsey
5. Karen B. Owens
6. Kate Stickles
7. Laurie S. Silverstein
8. Mary F. Walrath
9. Thomas M. Horan

Other Parties in Interest

1. Softbank
2. Blackrock Institutional Trust Company, N.A.
3. Blackrock
4. GAC R&D Silicon Valley, Inc.
5. QMC
6. Rheinmetall
7. Sybridge Advantage Engineering, Inc.
8. The Renco Group, Inc. dba Inteva Products, LLC
Victoria

Equity Committee

1. Crestline Management, L.P.
2. Esopus Creed Value Series Fund LP – Series “A”
3. Pertento Partners LLP

Sale Parties

1. LAS Capital LLC
2. Skadden Arps Slate Meagher & Flom
LLP
3. Miller Buckfire & Co.

Schedule 2

Schedule 2

Party In Interest	Connection
Allen & Overy LLP	WBD has represented this party in interest in matters unrelated to these Chapter 11 Cases.
Allied World	WBD has represented this party in interest in matters unrelated to these Chapter 11 Cases.
Amazon Web Services	WBD has represented this party in interest or its affiliates in matters unrelated to these Chapter 11 Cases.
AON (Bermuda) Ltd.	WBD represents and has in the past represented this party in interest and its affiliates in matters unrelated to these Chapter 11 Cases.
Arthur J. Gallagher Risk Management Services Inc.	WBD UK represents and has represented this party in interest in matters unrelated to these Chapter 11 Cases. WBD partner Don Detweiler is a former partner with this party in interest.
ATCO Industries, Inc.	WBD has represented this party in interest or its affiliates in matters unrelated to these Chapter 11 Cases.
Black Rock Institutional Trust	WBD has represented this party in interest and/or affiliates of this party in matters unrelated to these Chapter 11 Cases.
China Citic Dicastal Co. Ltd.	WBD represents this party in interest or its affiliates in matters unrelated to these Chapter 11 Cases.
Cigna Health and Life Insurance Company	WBD has represented this party in interest in matters unrelated to these Chapter 11 Cases.
Cincinnati Insurance Company	WBD represents this party in interest in matters unrelated to these Chapter 11 Cases.
Continental Casualty Company	WBD represents this party in interest in matters unrelated to these Chapter 11 Cases.
David Cohen	WBD UK represents an individual with a similar name in matters unrelated to these Chapter 11 Cases
Deloitte & Touch LLP	WBD UK represents this party in interest or its affiliates in matters unrelated to these Chapter 11 Cases.
Dentons US	WBD has represented this party in interest in matters unrelated to these Chapter 11 Cases.
E*Trade Financial Corporate Services Inc.	WBD represents this party in interest or its affiliates in matters unrelated to these Chapter 11 Cases.
Endurance Assurance Corporation	WBD represents this party in interest in matters unrelated to these Chapter 11 Cases.
Ernst & Young US	WBD has represented this party in interest in matters unrelated to these Chapter 11 Cases.
Foley & Lardner LLP	WBD has represented this party in interest in matters unrelated to these Chapter 11 Cases.
FTI Consulting	WBD represents this party in interest in matters unrelated to these Chapter 11 Cases.
General Motors	WBD represents this party in interest in matters unrelated to these Chapter 11 Cases.
Hagens Berman Sobol Shapiro LLP	WBD has represented this party in interest in matters unrelated to these Chapter 11 Cases.
JP Morgan Securities	WBD represents and has in the past represented this party in interest and its affiliates in matters unrelated to these Chapter 11 Cases.
KPMG	WBD has represented this party in interest in matters unrelated to these Chapter 11 Cases.

Schedule 2

Party In Interest	Connection
National Union Fire Ins. Co. of Pittsburgh, PA	WBD represents and has represented this party in interest or its affiliates in matters unrelated to these Chapter 11 Cases.
Nelson Mullins Riley & Scarborough	WBD has represented this party in interest in matters unrelated to these Chapter 11 Cases.
ODP Business Solutions LLC	WBD represents and has represented this party in interest or its affiliates in matters unrelated to these Chapter 11 Cases.
Orange County Property Tax	WBD represents this party in interest in matters unrelated to these Chapter 11 Cases.
Payscale, Inc.	WBD represents this party in interest in matters unrelated to these Chapter 11 Cases.
Principal Life Insurance Company	WBD represents this party in interest in matters unrelated to these Chapter 11 Cases.
Rentokil North America, Inc. d/b/a Western Exterminator Company	WBD UK represents and has represented this party in interest in matters unrelated to these Chapter 11 Cases.
Ricoh USA, Inc.	WBD has represented this party in interest or its affiliates in matters unrelated to these Chapter 11 Cases.
Robert Half International, Inc.	WBD represents and has represented this party in interest in matters unrelated to these Chapter 11 Cases.
Skadden Arps Slate Meagher & Flom LLP	WBD has represented this party in interest in matters unrelated to these Chapter 11 Cases.
Sonitrol Orange County	WBD represents this party in interest or its affiliates in matters unrelated to these Chapter 11 Cases.
Strauss Troy	WBD has represented this party in interest in matters unrelated to these Chapter 11 Cases.
Tata Consultancy Services Limited	WBD represents and has represented this party in interest or its affiliates in matters unrelated to these Chapter 11 Cases.
Thyssenkrupp Materials NA, Inc. dba Ken-Mac Metals	WBD UK represented this party in interest or its affiliates in matters unrelated to these Chapter 11 Cases.
Transamerica Corp.	WBD has represented this party in interest or its affiliates in matters unrelated to these Chapter 11 Cases.
Troutman Pepper Hamilton Sanders LLP	WBD UK represents and has represented this party in interest in matters unrelated to these Chapter 11 Cases. WBD partner Don Detweiler is a former partner with this party in interest.
Underwriters of Lloyd's of London	WBD represents and has in the past represented this party in interest and its affiliates in matters unrelated to these Chapter 11 Cases.
Warner Norcross & Judd LLP	WBD has represented this party in interest in matters unrelated to these Chapter 11 Cases.
Winston & Strawn	WBD has represented this party in interest in matters unrelated to these Chapter 11 Cases.
XL Specialty Insurance Company	WBD represents and has in the past represented this party in interest and its affiliates in matters unrelated to these Chapter 11 Cases.